

EXHIBIT 22

1 UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 GOVERNMENT OF THE UNITED)
4 STATES VIRGIN ISLANDS)

5 Plaintiff,)

6 vs.)

7 JPMORGAN CHASE BANK, N.A.,)

8 Defendant/Third-)
9 Party Plaintiff.)

10 JPMORGAN CHASE BANK, N.A.)

11 Third-Party)
12 Plaintiff,)

13 vs.)

14 JAMES EDWARD STALEY,)

15 Third-Party)
16 Defendant.)

17 THURSDAY, JULY 13, 2023

18 CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

19 - - -

20 Videotaped deposition of 30(b)(6)
21 JPMorgan Chase Bank, N.A., designee Francis
22 Pearn, held at the offices of Williams &
23 Connolly, 650 Fifth Avenue, Suite 1500,
24 New York, New York, commencing at 9:41 a.m.
25 Eastern, on the above date, before Carrie A.
Campbell, Registered Diplomate Reporter and
Certified Realtime Reporter.

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23 GOLKOW LITIGATION SERVICES
24 877.370.3377 ph | 917.591.5672 fax
25 deps@golkow.com

1 case, what was found.

2 QUESTIONS BY MR. WOHLGEMUTH:

3 Q. So JPMorgan's view is that the
4 cash activity that Mr. Epstein was engaging
5 in was, in fact, consistent with the
6 explanation that he provided?

7 A. That's correct.

8 Q. Has any other private banking
9 client of JPMorgan ever said, I'm withdrawing
10 hundreds of thousands of dollars in cash
11 every year to pay for private aviation
12 expenses? Is that an explanation that's ever
13 been provided to your knowledge, sir?

14 MR. BUTTS: Objection. Beyond
15 the scope.

16 You may answer as a 30(b)(1)
17 witness.

18 THE WITNESS: I have no idea or
19 have heard of that being an
20 explanation for large cash.

21 That said, I have seen very
22 large amounts of cash be taken out of
23 the bank by private bank clients over
24 my time at the bank.

25

1 So I just want to be more
2 precise as to how that investigation began.

3 Q. Understood.

4 And as it related to
5 Mr. Staley, that investigation began at what
6 time?

7 A. So that would have been in
8 probably end of September, beginning of
9 October 2019 when we were in, I'd say, very
10 much the heaviest part of the investigation
11 around Mr. Epstein and Ms. Maxwell, for that
12 matter, in response to those subpoenas.

13 The e-mails that we found
14 between Mr. Staley and Mr. Epstein was part
15 of that investigation, and those e-mails were
16 provided to our AML investigators who then
17 did the work that you saw resulting in the --
18 what I'll call the connection of wires from
19 Mr. Epstein's accounts to the woman [REDACTED],
20 what have you, and then linking it to the
21 e-mails between Mr. Staley and Mr. Epstein
22 [REDACTED].

23 Q. JPMorgan was aware before this
24 e-mail review that you've mentioned that
25 Mr. Staley had a relationship with

1 Mr. Epstein, correct?

2 A. That's correct.

3 Q. JPMorgan was aware that
4 Mr. Epstein hosted Mr. Staley at his home,
5 correct?

6 A. That's correct.

7 Q. On a number of occasions,
8 correct?

9 A. Correct.

10 Q. JPMorgan was aware that
11 Mr. Staley visited other properties owned by
12 Mr. Epstein, fair?

13 A. That's correct.

14 Q. And when communicating with
15 Mr. Epstein, Mr. Staley used his JPMorgan
16 account primarily it's fair to say, right?

17 MR. BUTTS: Objection.

18 You may answer as a 30(b)(1)
19 witness if you --

20 THE WITNESS: I honestly don't
21 know. I can only comment on what I
22 saw through the JPMorgan e-mail
23 account.

24 QUESTIONS BY MR. WOHLGEMUTH:

25 Q. Okay. That's fair. Let me put